

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

AMEERA SHAHEED and EARL  
DICKERSON,

*Plaintiffs,*

v.

CITY OF WILMINGTON, FIRST STATE  
TOWING, LLC and CITY TOWING  
SERVICES, LLC,

*Defendants.*

C.A. No. 21-01333 CFC

**ORDER DISMISSING CIVIL ACTION  
AND RETAINING JURISDICTION  
OVER THE SETTLEMENT  
AGREEMENT**

IT IS HEREBY STIPULATED AND AGREED by and between counsel for Plaintiffs and counsel for Defendants that this action, including all claims asserted in the Complaint and all claims and crossclaims asserted against Defendants, shall be and hereby is dismissed with prejudice and without fees or costs against any party, except as provided in the Settlement Agreement dated as of December 16, 2024.

The Court shall retain continuing and exclusive jurisdiction over the underlying action and over enforcing this Settlement Agreement, including jurisdiction over the Parties for the purpose of enforcing this Settlement Agreement. The Court shall retain continuing and exclusive jurisdiction to interpret, implement, administer and enforce the Settlement Agreement.

Dated: December 16, 2024

MCCARTER & ENGLISH, LLP

/s/ Daniel J. Brown

Daniel J. Brown (#4688)  
405 North King Street, 8th Floor  
Wilmington, DE 19801  
(302) 984-6300

djbrown@mccarter.com

SHAW KELLER LLP

/s/ John Shaw

John Shaw (#3362)  
I.M. Pei Building  
1105 North Market Street, 12th Floor  
Wilmington, DE 19801  
(302) 298-0700  
jshaw@shawkeller.com

-and-

Adam N. Saravay  
Nicole M. Virella  
Four Gateway Center  
100 Mulberry St.  
Newark, NJ 07102  
(973) 622-4444  
asaravay@mccarter.com  
nvirella@mccarter.com

*Attorneys for Defendant City of Wilmington*

**JOSEPH W. BENSON, P.A.**

/s/ Joseph W. Benson

Joseph W. Benson  
Andrew G. Ahern, III  
1701 North Market Street  
P.O. Box 248  
Wilmington, DE 19899  
(302) 656-8811  
aahern@jwbpa.com  
jbenson@jwbpa.com

*Attorneys for Defendant City Towing*

**INSTITUTE FOR JUSTICE**

William R. Aronin  
901 North Glebe Road, Suite 900  
Arlington, VA 22203  
(703) 682-9320  
waronin@ij.org  
agoodman@ij.org

Robert E. Johnson  
16781 Chagrin Boulevard, #256  
Shaker Heights, OH 44120  
(703) 682-9320  
rjohnson@ij.org

*Attorneys for Plaintiffs*

**REGER RIZZO DARNALL LLP**

/s/ Robert W. Small

Robert W. Small  
Scott L. Silar  
Brandywine Plaza West  
1521 Concord Pike, Suite 305 Wilmington,  
DE 19803  
(302) 477-7100  
ssilar@regerlaw.com  
rsmall@regerlaw.com

*Attorneys for Defendant First State Towing*

SO ORDERED this 17<sup>th</sup> day of December, 2024.

Hon. Colm F. Connolly

